

From: Rochlin, Kevin
Sent: Wednesday, September 25, 2013 9:12 AM
To: Kelly Wright
Cc: Jennings, Jannine; susanh@ida.net
Subject: RE: Update on Field Work and potential field change on the gamma cap

Categories: 11-19 to 1-10 2014

Our oversight people were onsite to observe the testing. Schedule was in the letter from Barbara Ritchie sent on the 9th. I also sent an email out as a reminder, but I did it from home, using epa's offsite mail service, so I do not have a copy.

Just spoke briefly with Barbara and will talk to her again this afternoon and report out. They may be proposing hay bales as a shield. Not sure whether my rad guys will agree with this or not.

Regardless, we will be back on site next week (probably Tuesday) if that is when things start up. Tribe is definitely allowed onsite when we are there. Will send you the contact number for person who we have there when I know who will be out there.

Kevin

From:

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From: Kelly Wright [mailto:kwright@sbtribes.com]
Sent: Wednesday, September 25, 2013 7:25 AM
To: Albright, Rick; Rochlin, Kevin
Cc: susanh@ida.net; Virginia Monsisco
Subject: FW: Update on Field Work and potential field change on the gamma cap

Kevin and Rick, I thought EPA was planning on being onsite during these activities. As for their gamma cap design, it clearly shows that they don't know how to operate or utilize the appropriate instrumentation. Based on the comment you made below, the gamma detector could have been shielded depending upon what they are using (In-situ Gamma spectroscopy has been around for a long time). Did they take photographs documenting their assumption probably not. In the future, the Tribes would like to be present when this sort of activity is going on. We do have experience working in a radiological environment safely and understand the principles behind it.

Why wasn't EPA onsite for this activity? Council asked and were told that someone would be onsite at all times.

Tribes are requesting that we be allowed to show up and observe but FMC does not allow us unless you are present which is dumb. EPA can tell FMC that we are coming and have your permission to be there?

Let me know
Kelly

From: Susan Hanson [mailto:susanh@ida.net]
Sent: Wednesday, September 25, 2013 6:48 AM
To: Rochlin, Kevin; Kelly Wright
Subject: Re: Update on Field Work and potential field change on the gamma cap

Kelly,

It was my understanding EPA /Tribes would be out conducting oversight during all phases of FMC work. This is what I assured the FHBC. I was not aware this work had started. Can we make arrangements to go out to FMC?

Susan Hanson

On Sep 24, 2013, at 3:44 PM, "Rochlin, Kevin" <rochlin.kevin@epa.gov> wrote:

I wanted to give everyone an update on what is going on with implementing the gamma cap work plan and some issues that have come up.

Per FMC's letter of September 9, work on the test cap began last week. When the test cap was installed and gamma measurements were taken, results were above the action level required in the ROD/Work Plan. FMC believes it is the result of gamma shine (gamma emitting from surrounding sources). When FMC moved heavy equipment between the test pad and line of site, the measured gamma readings were below the action level.

We had a conference call last Friday to discuss the results and course of action. While EPA is willing to accept the fact that there may in fact be gamma shine, this needs to be evaluated both in terms of the work plan requirements to meet the action level with the test cap, and because FMC is ultimately responsible for post remedial action conformational sampling showing that gamma is below the action level.

EPA's current thoughts are:

- 1) the additional lift required in the Work Plan should be installed to determine whether this eliminates the issue.
- 2) If FMC wants to use line of site shielding, there has to be a methodical plan for how to do this that is documentable.
- 3) Shielding should be done in conjunction with the additional lift, i.e. erect a shield outside the test cap, then measure; place the additional lift then measure; remove the shield and measure. That way there are measurements of two lift thicknesses with and without shielding.

FMC has also proposed the idea that they build a new test pad as far away from the slag piles as they can using 5 feet of slag base and then rebuilding the test cap on top of that.

I will be talking to FMC tomorrow, and so any thoughts that you have are appreciated. I will have them produce a field change document. It will require a very quick review of a day or less.

I have included the email chain from my contractors so that you can see what their thoughts are.

Finally, I have spoken to Janine Jennings on how they have handled field changes at Simplot and the need for fast turn around on issues. I am using her method of putting it out to everyone for responses with a quick turnaround time. If any of you have any ideas let me know.

Kevin

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From: Richard Poeton [<mailto:rtpoeton@msn.com>]

Sent: Tuesday, September 24, 2013 1:59 PM

To: 'Greutert, Ed [USA]'; Rochlin, Kevin

Cc: 'Bozic, James [USA]'
Subject: RE: Update on Field Work

Sorry for slow response as I have been all over New England with family visiting last week.

This sounds like a case for variable isolation in testing. My opinions:

If they can't get the levels down to where they should be with additional thickness, it could mean that there is shine from someplace. In the case of the test cap, it is possible that the cap diameter is not great enough (calculations to the contrary notwithstanding). So additional width might have to be examined as well.

If it turns out that measurements still don't go down, then I would recommend collimation tests to shield out potential interferences. These would probably need to be done both before and after capping to establish how much reduction the capping has provided.

Alternate collimated measurement systems (in-situ gamma spec) could also be considered.

If all this sounds like some kind of science experiment, that's exactly what it is. The purpose is not only to see if the selected cap thickness is adequate, but also to see if the selected measurement techniques are adequate to meet the DQOs and cleanup requirements. If shine is a problem, then we need to find a way around it.


From: Greutert, Ed [USA] [mailto:greutert_ed@bah.com]
Sent: Wednesday, September 18, 2013 8:08 PM
To: Rochlin, Kevin (rochlin.kevin@epa.gov)
Cc: Bozic, James [USA]; Poeton. Rick (rtpoeton@msn.com)
Subject: Update on Field Work

Kevin-

I spoke with James and I wanted to give you an update. The gamma PIC measurements came back and the results showed they are slightly higher than 20 uR/hr. Rob Hartman wants to schedule a telecom for 8AM PST to discuss and said he would send out a meeting invite. FMC seems to be indicating they believe it is due to shine. My gut feeling is that they should stick with the plan and add a 6" lift and re-do the PIC measurements. If there is no change, it would probably support the shine argument. If it decreases, then it probably supports the need for a thicker cap. I've cc'd Rick for his thoughts, but I don't know if he will see this before the call.

I can be reached this evening and tomorrow after 7:15AM PST at 206-794-7526.

Tx,

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